

DINOVO PRICE

MEMO ENDORSED

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January 22, 2024

Via ECF

Hon. Valerie E. Caproni, U.S. District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, New York 10007

USDC SDNY
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**Re.: *Preservation Technologies LLC v. Forbes Media LLC*
Case No. 1:23-cv-10609 (VEC)**
Our File No.: 1865-101

Dear Judge Caproni:

Pursuant to Rule 2.C of Your Honor's Individual Rules of Practices, I write on behalf of Plaintiff Preservation Technologies LLC ("Preservation") and Defendant Forbes Media LLC ("Forbes") to jointly request an extension of time to submit a joint letter to the Court with the parties' Case Management Plan and Scheduling Order, both of which are currently due on January 25, 2024. Additionally, the parties respectfully jointly request an adjournment of the initial pretrial conference currently set for February 2, 2024. *See Doc. 12.* Counsel for Preservation has conferred with Counsel for Forbes, who has approved the contents of this letter and joins in both requests.

On January 22, 2024, Preservation filed its unopposed letter request asking this Court to find this matter (the "Forbes Action") and *Preservation Technologies LLC v. TIME USA, LLC*, C.A. No. 1:23-cv-10611 (S.D.N.Y. Dec. 5, 2023) (the "TIME Action") related under Rule 13(a)(1). *See Doc. 21.* As of the date of this filing, Preservation's request is pending. Accordingly, Preservation and Forbes respectfully request an extension of the initial pretrial conference and propose a new date that falls on the first Friday that is at least thirty (30) days from the date this Court issues a ruling on Preservation's unopposed request to relate the Forbes and TIME Actions. Further, the parties respectfully request the Court extend the parties' deadline to submit a joint letter with their Case Management Plan and Scheduling Order to a date that is one (1) week prior to the new initial pretrial conference date. No prior extensions have been sought.

We appreciate the Court's consideration of this request.

Respectfully,

DINOVO PRICE LLP

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By:



Nicole E. Glauser

cc: Counsel of Record (via ECF)

Application GRANTED in part. The initial pretrial conference currently scheduled for **February 2, 2024** is adjourned to **February 9, 2024** at **10:00 A.M.** in Courtroom 443 of the Thurgood Marshall Courthouse, 40 Foley Square, New York, New York, 10007. The parties' joint letter must be filed no later than **February 1, 2024**. For the required contents of the joint letter, the parties are directed to Dkt. 12.

SO ORDERED.

1/22/2024



HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE